

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

MUNA AL-SUYID, <i>et al.</i> ,)	
)	
Plaintiffs,)	
)	
v.)	Case No. 1:20-cv-00170 (LMB/MSN)
)	
KHALIFA HIFTER,)	
)	
Defendant.)	
_____)	

**DEFENDANT'S MOTION TO COMPEL AND
LIMITEDLY EXTEND DISCOVERY**

Defendant Khalifa Hifter respectfully moves this Court to (1) compel Plaintiffs to complete their depositions; (2) compel Plaintiffs to answer questions regarding who they have spoken to regarding this litigation, depositions, and discovery, as well as who they have spoken to in preparing for their depositions and preparing their discovery responses; (3) supplement their discovery to provide full and complete responses as required by law; (4) provide a privilege log of communications with litigation counsel pre-filing of Plaintiffs' Complaint and all non-litigation counsel communications with Plaintiffs through trial; and (5) limitedly extend discovery. Defense counsel and Plaintiffs' counsel have met and conferred regarding these issues.

For the reasons set forth in the supporting memorandum, Mr. Hifter respectfully requests the Court to compel Plaintiffs' testimony and supplemental responses.

Dated: October 15, 2021

Respectfully submitted,

/s/ Lindsay R. McKasson

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CERTIFICATE OF SERVICE

I certify that on October 15, 2021, a copy of the foregoing was filed with the Clerk of the Court using the Court's CM/ECF system, which will send a copy to all counsel of record.

Dated: October 15, 2021

/s/ Lindsay R. McKasson

Lindsay R. McKasson

Attorney for Defendant Khalifa Hifter